

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

IN RE GENWORTH FINANCIAL INC.
SECURITIES LITIGATION

No. 3:14-CV-00682-JAG

DEFENDANTS' MOTION TO REINSTATE STAY OF DISCOVERY

Defendants Genworth Financial, Inc. ("Genworth"), Thomas J. McInerney, and Martin P. Klein, by counsel, and pursuant to Federal Rule of Civil Procedure 26(c), respectfully move this Court to reinstate its September 28, 2015 stay of discovery in this action—limited to staying deposition discovery of any of Genworth's current or former employees and directors in this action—pending a decision on a motion to dismiss any newly filed derivative action, for the reasons detailed in the accompanying Memorandum of Law in Support.

Dated: October 5, 2015

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on this 5th day of October, 2015, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

/s/

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